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ABA No.: 8811188

IN THE UNITED STATES DISTRICT COURT

## DISTRICT OF ALASKA

SALLY C. PURSER.

Plaintiff,

vs.

JOSEF F. BOEHM, ALLEN K. BOLLING and BAMBI TYREE

Defendant.

) Case No. 3:05-CV-00085-JKS

PLAINTIFF'S FOURTH SET OF DISCOVERY, ADMISSIONS AND  
INTERROGATORIES, REQUESTS

## DEFINITIONS

Unless the question conclusively indicates otherwise, the following definitions apply to the words used in these interrogatories:

A. Person: The term "person" includes a corporation, partnership, other business association or entity, a natural person, and any government or government body, commission, board, or agency.

B. Document: The term "document" is defined to mean and include any and all graphic or physical representations, including without limitation all handwritten, typed or printed material, photographs, copies of all the foregoing, and material stored on tape or any other magnetic medium.

C. Identification of Documents: When you are requested to "identify" a document, you are requested to provide the following with regard to each document:

(1) A description of the document with sufficient particularity to enable the custodian of the document to respond to a request for production or subpoena duces tecum for the document;

(2) The name, business address, residence address, telephone number, and occupation of the present custodian of the document;

(3) The date on which such document was first prepared; and,

(4) The name, business address, residence address, telephone number, and occupation of each person who prepared or signed the document.

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D. Identification of Natural Person: When you are requested to "identify" a natural person, you are requested to provide the following with regard to each such person:

- (1) The name of the person;
- (2) The business address of the person;
- (3) The residence address of the person;
- (4) The business telephone number of the person;
- (5) The residence telephone number of the person;
- (6) The occupation of the person and the name of the employer of the person, if any.

E. Identification of Business Entity: When you are requested to "identify" any corporation, partnership, joint venture or other business entity, you are requested to provide the following with regard to each such entity:

- (1) Whether the entity is a corporation, partnership, joint venture, or other type of entity;
- (2) If the entity is a partnership or joint venture:
  - (i) identify each partner or joint venturer;
  - (ii) state whether he or she is a limited or general partner; and,
  - (iii) specify the date on which the partnership or joint venture was formed;
- (3) If the entity is a corporation:
  - (i) identify each of the current officers of the corporation;

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(ii) state the date of incorporation;

(iii) state the State in which the corporation is incorporated

**INTERROGATORIES**

**INTERROGATORY NO. 1:** If you have received any inheritances, including any life insurance proceeds or lawsuit settlements or annuities in the last five years. List the type and value of the inheritance lawsuit settlements or insurance proceeds received in the last five years; the approximate date such was received and what it was used for, if anything.

**ANSWER:**

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INTERROGATORY NO. 2: Please state in detail, your involvement and percent of ownership in an Alaska Limited Liability Corporation known as JEB, LLC. In responding to this interrogatory, state whether you know any of the following individuals, how you first met that individual, when you first met that individual, the relationship you have with that individual (e.g., friend, business associate, etc.), and whether you have communicated with that individual within the last year.

- a. Bruce Burnett
- b. Eric Harstad

ANSWER:

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**INTERROGATORY NO. 3:** Please state whether you know any of the following individuals, how you first met that individual, when you first met that individual, the relationship you have with that individual (e.g., friend, business associate, etc.), and whether you have communicated with that individual within the last year.

- a. Terry D. Shurtleff.
- b. Ron Bagley.
- c. Corey Grubb.
- d. Mike Kangas.

**ANSWER:**

**INTERROGATORY NO. 4:** Please state with detailed specificity your involvement in the case of AIH Acquisition Corp. LLC v. Alaska Indus. Hardware, Inc., 306 F. Supp. 2d 455, 2004 U.S. Dist. LEXIS 3195 (S.D.N.Y., 2004). Include in your response, the status of the case, an explanation of all orders in the case, and if the case has been litigated to final judgment, explain the result reached and reasoning therefore.

**ANSWER:**

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REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce the last FIVE years of the Internal Revenue Tax return documents you filed on behalf of yourself personally.

REQUEST FOR PRODUCTION NO. 2:

Please produce the name, address and phone number, including but not limited to, each and every person, company or corporation that assisted you with the preparation of your personal IRS tax returns for the last five years.

REQUEST FOR PRODUCTION NO. 3:

Please produce including but not limited to, any Personal State tax returns filed in Alaska or any other State in the United States for the last five years.

REQUEST FOR PRODUCTION NO. 4:

Please produce the name, address and phone number, including but not limited to, for each and every tax person that assisted you with the preparation of any Personal State tax returns for the last five years.

REQUEST FOR PRODUCTION NO. 5:

EXHIBIT 1  
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Please produce the name, address and phone number for, including but not limited to, any bank, savings and loan, holding facility, on or off shore accounts, stock accounts, that you have had or currently have in the last five years.

**REQUEST FOR PRODUCTION NO. 6:**

Please produce including but not limited to the names, addresses and phone numbers of any and all business partner that you have conducted business with in the last five years in the business known as Alaska Industrial Hardware, doing business as AIH or Alaska Industrial Hardware Inc.

**REQUEST FOR PRODUCTION NO. 7:**

Please produce including but not limited to the names, addresses and phone numbers of all or any business partner that you have conducted business with during the last five years in any businesses outside the State of Alaska.

**REQUEST FOR PRODUCTION NO. 8:**

Please produce including but not limited to the names, addresses and phone numbers of any and all business partner or partners that you have conducted business with during the past five years in any business in Anchorage, Alaska known as TGI Friday.

**REQUEST FOR PRODUCTION NO. 9:**

EXHIBIT 1

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Please produce including but not limited to all or any notes you are holding whereas any party or any third parties that owe you money for loans, debts, business holdings or property you have sold to them in the last five years.

**REQUEST FOR PRODUCTION NO. 10:**

Please produce including but limited to the names, address and phone numbers for any financial institution or collections agency that collects money from any parties on your behalf for the last five years.

**REQUEST FOR PRODUCTION NO. 11:**

Please list all assets you have sold, given away or transferred to any parties since you have been charged in the Federal case involving Sally Purser.

**REQUEST FOR PRODUCTION NO. 12:**

Please identify the parties that you have given, transferred or sold any assets to since you were charged in the Federal case involving Sally Purser. Please provide their name, address and phone number.

**ADMISSIONS:**

1. Please admit that you own fifty percent (50%) or more of Alaska Industrial Hardware Store located within Alaska or it's Corporation.

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ANSWER:

2. Please admit that you own some percentage of Alaska Industrial Hardware Company, located within Alaska or its Corporation and state what that percentage you have owned for the last five years, year by year.

ANSWER:

3. Please admit that since the time you were charged in the Federal Criminal proceedings involving Sally Purser and other minor children you have not hid, transferred, sold or given away any assets to protect them from being attached by Sally Purser.

ANSWER:

4. Please admit that you own some percentage of ownership in businesses outside the State of Alaska and identify the business, its location and the interest you own.

ANSWER:

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5. Please admit that you have filed all the required income taxes with the Internal Revenue Service in the last five years, for yourself personally and all or any businesses that you are required to do so.

ANSWER:

6. Please admit that you have filed all the required Corporation tax documents with the State of Alaska in the last five years for any and all businesses you are affiliated with.

ANSWER:

7. Please admit that you filed all the required tax documents in any other State of the United States in which you are required to do so, for yourself personally on behalf of any and all businesses you are affiliated with, for the last five years.

ANSWER

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8. Please admit that you are part owner in TGI Fridays Restaurant in Anchorage, Alaska.

ANSWER

9. Please admit that you have not attempted to file for bankruptcy since Salley Purser filed a civil complaint against you with regard to 3:05-CV-00085 JKS.

ANSWER

DATED at Anchorage, Alaska, this 17<sup>th</sup>, day of May, 2007.

LAW OFFICE OF DARRYL L. JONES

Attorney for Plaintiff, Salley Purser

By: [Signature] 06/11/07

Darryl L. Jones, Esq.

ABA # 8811188

EXHIBIT 1

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VERIFICATION

STATE OF CALIFORNIA )

) ss.

\_\_\_\_ JUDICIAL DISTRICT )

I, affirm under oath that the above answers to interrogatories are true to the best of my present recollection and belief.

\_\_\_\_\_  
JOSEF BOEHM

SUBSCRIBED AND SWORN to before me this \_\_\_\_\_, day of \_\_\_\_\_  
2007, at \_\_\_\_\_, California.

\_\_\_\_\_  
Notary Public in and for the State of California

My Commission Expires:

EXHIBIT 1

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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

Salley C. Purser, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
Josef F. Boehm, Allen K. Bolling, )  
and Bambi Tyree, )  
 )  
Defendants. )  
 )

Case No: A05-0085 (JKS)

CERTIFICATE OF SERVICE

This is to certify that on or about the 17<sup>th</sup> day of May, 2007, a true and correct copy of the foregoing document was caused to be mailed to the following parties of record via United States postal service:

Allen K. Bolling  
Inmate No: 14911-006  
USP Terre Haute  
U.S. Penitentiary  
P.O. Box 12015  
Terre Haute, IN 47801

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Josef Boehm  
c/o David Kenner  
Kenner Law Firm  
16000 Ventura Blvd., Ste.1208  
Encino, CA 91436

AND VIA FAX AND MAIL:

Pamela Sullivan  
Wade, Kelley & Sullivan  
745 W. 4<sup>th</sup> Avenue, Suite 200  
Anchorage, Alaska 99501



Deborah Fenton  
Legal Assistant to Darryl L. Jones

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EXHIBIT 1

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